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October 19, 2010

Julius Genachowski  
FEDERAL COMMUNICATIONS COMMISSION  
445 12<sup>th</sup> Street SW  
Washington, DC 20554

Re: Connect America Fund – WC Docket No. 10-90  
A National Broadband Plan for Our Future – GN Docket No. 09-51  
High-Cost Universal Service Support – WC Docket No. 05-337

Dear Chairman Genachowski:

After reviewing the Reply Comments of the Iowa Utilities Board (IUB) in this docket, the Rural Iowa Independent Telephone Association (RIITA) believes an additional response is necessary to Comment Number 1, appearing on page 5.

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Act, much less why it should be a primary consideration in designing a new fund or providing broadband access. Many high-cost companies have been offering affordable telephone service for years to people who would not be provided service without the Universal Service Fund. RIITA, like other associations representing rural independent carriers, participated in dockets at the state and federal level urging that the Universal Service Fund be limited to that purpose. We resisted both expansion of the fund to wireless carriers who operated in different service areas and repeatedly recommended elimination of the identical support rule. The IUB's comments show a marked lack of understanding regarding the issue of high-cost telecommunications services and confuse the issues of access and universal service.

Second, the term "access pumping" has been adopted primarily by interexchange carriers and applied to a number of different situations, some of which are legitimate increases in business. Using an argumentative term in comments to the Commission by another regulatory agency is unfortunate and vague.

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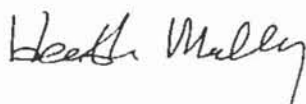
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Finally, even the IUB's statement regarding free conferencing services assumes that providing conferencing services is somehow improper, something this Commission has repeatedly said is not true. Conferencing services have been offered by numerous companies, including interexchange carriers, at various rates and with various enhancements for decades. It is a mistake to lump those services together under one category and use those services to argue for Universal Service Fund changes.

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Sincerely,

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Heath Mallory

RIITA President



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Robert M. McDowell  
FEDERAL COMMUNICATIONS COMMISSION  
445 12<sup>th</sup> Street SW  
Washington, DC 20554

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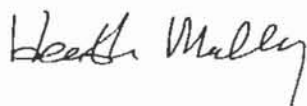
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Heath Mallory

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October 19, 2010

Michael J. Copps  
FEDERAL COMMUNICATIONS COMMISSION  
445 12<sup>th</sup> Street SW  
Washington, DC 20554

Re: Connect America Fund – WC Docket No. 10-90  
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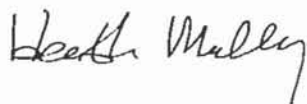


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October 19, 2010

Mignon Clyburn  
FEDERAL COMMUNICATIONS COMMISSION  
445 12<sup>th</sup> Street SW  
Washington, DC 20554

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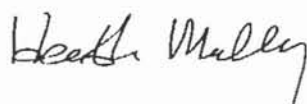
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Meredith Attwell Baker  
FEDERAL COMMUNICATIONS COMMISSION  
445 12<sup>th</sup> Street SW  
Washington, DC 20554

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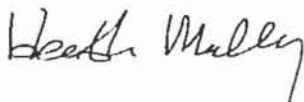
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